

EXHIBIT 4

Paul Grandinetti

From: Paul Grandinetti
Sent: Wednesday, July 20, 2016 12:25 PM
To: Wu, Eric Y.
Cc: Brzezynski, Lora A.; Geiszler, Steven M.
Subject: NEW DRAFT - Consent Order re VGJ.com and YJX.com
Attachments: EDVA.VGJ.YJX.Consent.Order.ARL.Revised.071916.DOCX

Dear Mr. Wu:

Attached is the revised language for a Consent Order.

Please contact us by telephone if you have any questions.

Thank you,
Paul Grandinetti

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ASSOCIATED RECOVERY, LLC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:15-cv-01723-AJT-JFA
)	
JOHN DOES 1-44,)	
)	
<i>Defendants in rem.</i>)	

CONSENT ORDER REGARDING VGJ.COM AND YJX.COM

WHEREAS Plaintiff Associated Recovery, LLC and *in rem* Defendants VGJ.com and YJX.com, through their respective counsel, acknowledge this Court's recent decisions that the dispute between them should be decided on the merits and not through the Default Judgment entered on May 18, 2016 (ECF 43);

WHEREAS the Court already transferred all previously appearing defendants to the Northern District of Texas (Case No. 3:16-cv-1025-L), and the relevant issues pertaining to *in rem* Defendants VGJ.com and YJX.com substantially overlap with the issues pertaining to the already-transferred defendants; and

WHEREAS Plaintiff and Defendants agree to maintain the *status quo* regarding control over the Internet domains VGJ.com and YJX.com, such that no third party should obtain such registration or control by sale, auction, or other conveyance;

WHEREFORE, Plaintiff and Defendants respectfully request and stipulate that the Court grant this Motion and set aside the Default Judgment entered on May 18, 2016 (ECF 43) with respect to VGJ.com and YJX.com and transfer this action against them to the Northern District of Texas, without prejudice to, and Defendants expressly reserving the right to assert,

Defendants' defenses under Federal Rule of Civil Procedure 12(b). Plaintiff and Defendants further respectfully request and stipulate that the Court order the registrar of the domain names VGJ.com and YJX.com to maintain the current registration and not to alter the same absent further express order by the Federal Court presiding over this dispute.

SO ORDERED this _____ day of _____, 2016.

Dated: July XX, 2016

Respectfully submitted,

/s/ Eric Y. Wu

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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of July, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Counsel for Associated Recovery, LLC

Dated: July 15, 2016

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